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October 29, 2021

Honorable Alison J. Nathan
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*
S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

Ghislaine Maxwell requests that the Court issue an order requiring delivery of her legal mail within one business day of receipt by the post office. (*See* Dkt. 350.) The problems encountered by legal mail delays continue. I have attempted to address this with MDC Legal via email (but at times receive no response) and have conferred with government counsel. Only after two emails were sent today, the latter informing MDC Legal that failure to respond would result in the filing of an order to show cause, did I receive a response: “There was mail picked up today,” but no indication when Ms. Maxwell will receive the mail.

Legal mail sent by counsel through the United States Postal Service for “next day delivery” remains at the post office for pick up by the MDC. The mail is not picked up daily, as evidenced by tracking information (most recently obtained this morning) and often remains at the Post Office for days before retrieved by the MDC. (*See* Exhibit A.) The Court invited the defense to bring this issue to the Court’s attention if Ms. Maxwell does not receive mail within one business day of receipt. We are requesting that the Court direct the MDC to retrieve the mail within one business day of receipt by the post office so that legal mail sent “next day delivery” does not languish in the post office for days on end. The government suggests this may be due to resource issues at the MDC and reminds us that Ms. Maxwell’s mail is handled the same as that of other inmates. But unlike other inmates, Ms. Maxwell is

now a month away from trial and any delay receiving her legal mail impedes her ability to adequately prepare for trial.

Further, Ms. Maxwell is not receiving disclosures sent via Federal Express by the government in a timely manner. We have requested that within a month of commencement of trial, government disclosures be hand delivered to the MDC to alleviate delivery delays. The government has declined this request, again claiming resource issues. There is no assurance that Ms. Maxwell will receive legal mail – critical to trial preparation – in a timely manner. This is yet another example of how pretrial detention is encumbering Ms. Maxwell’s ability to prepare for trial and interfering with her ability to effectively communicate with counsel. This should undermine the Court’s confidence that Ms. Maxwell and her attorneys will be fully able to prepare for trial.

Very truly yours,

/s/

BOBBI C. STERNHEIM

cc: All counsel of record

EXHIBIT A

Tracking Number: EJ699436400US

Scheduled Delivery by

SATURDAY

16 OCTOBER 2021 i by **6:00pm** i

Status

Available for Pickup

October 19, 2021 at 6:51 am
BROOKLYN, NY 11232

Get Updates 

Available for Pickup

See More 

Tracking Number: EJ699436435US

Scheduled Delivery by

THURSDAY

14 OCTOBER 2021 i by **6:00pm** i

Status

Available for Pickup

October 15, 2021 at 7:55 am
BROOKLYN, NY 11232

Get Updates 

Available for Pickup

See More 

Tracking Number: EJ699436427US

Scheduled Delivery by

THURSDAY

28

OCTOBER
2021 ⓘ

by

6:00pm ⓘ

Status

Available for Pickup

October 28, 2021 at 10:59 am
BROOKLYN, NY 11232

Get Updates ✓

Available for Pickup

Text & Email Updates



Proof of Delivery



Tracking History



Product Information



See Less ^

Tracking Number: EJ699436413US

Scheduled Delivery by

SATURDAY

9

OCTOBER
2021 ⓘ

by

6:00pm ⓘ

Status

Available for Pickup

October 12, 2021 at 9:07 am
BROOKLYN, NY 11232

Get Updates ✓

Available for Pickup

See More v